

escalationPC102301-2.txt

flpowers@eschelon.com on 01/02/2002 05:21:15 PM

To: flpowers@eschelon.com
cc:

Subject: Eschelon Telecom Inc. --- CR#PC102301-2 --- S

Escalation
Company: Eschelon Telecom Inc.
CR#: PC102301-2
Status Code: S

Qwest Action Requested:
stop impacted activities

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Description:

Eschelon escalates Qwest's refusal to accept Eschelon's Change Request ("CR") #PC102301-2 and the process that Qwest used to do so. On October 23, 2001, Eschelon submitted this CR to Qwest. The description of the requested change in CR # PC102301-2 provides:

The performance measure OP-13A is intended to measure the percentage of LSRs for coordinated Hot Cuts of unbundled loops that are completed on time, focusing on cuts completed within one hour of the committed order due time. For LSRs to be considered "on time," the CLEC must agree to the start time, and Qwest must (1) receive verbal CLEC approval before starting the cut or lifting the loop, (2) complete the physical work and appropriate tests, (3) complete the Qwest portion of any associated LNP orders, and (4) call the CLEC with completion information, all within one hour of the

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committed order due time. Eschelon interprets the statement to include the successful porting of the number(s) from Qwest to the CLEC through NPAC. Eschelon and Jim Make, Dana Filip, and Steve Sheahan of Qwest met for a meeting in July 2001. During the meeting, Qwest made a statement that the QCCC defines (3) as completing the removal of the number(s) out of the Qwest switch and does not consider the porting of the number(s) from Qwest to the CLEC through NPAC as part of the PID measurement. The porting of numbers is an integral part of a Coordinated Hot Cut. When numbers are not ported from Qwest to the CLEC, end user customer's service is adversely affected. Eschelon asks Qwest to include the successful porting of number(s) from Qwest to the CLEC through NPAC when reporting on the OP13 PID measurement.

History of Item:

On October 23, 2001, Eschelon submitted this CR to Qwest. Also on October 23, 2001, Matt Rossi of Qwest responded with a number for the CR (# PC102301-2). Qwest did not post the CR on the web, as required by the CMP procedures. No other activity took place with respect to this CR for more than a month. This is not the first time that this has occurred. When Qwest previously did not respond to a CR, Eschelon raised the issue with CMP Re-Design. In an email dated October 11, 2001, Eschelon said to Qwest and the CMP Re-Design Core Team: "From a process perspective, perhaps we need to discuss this. We thought that Qwest should have accepted this and

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given us a number within two days. Does Qwest have a process under which Qwest works on CRs but does not give the CRs a number or post them? If so, what are the criteria, and where is the documentation?" Although Eschelon asked that this issue be dealt with in Re-Design, Qwest has not committed to addressing it. At least in the meantime, the applicable CR procedures should be applied, a CR should be accepted when complete and posted to the web. If Qwest believes that the CR is outside the scope of CMP, Qwest should so state in its written response. At least then the CLEC knows that the time to escalate has come. The decision as to whether to accept a CR should be subject to escalation. If not, there is no monitoring of such decisions and no recourse for an incorrect decision.

On December 3, 2001, Kathy Stichter of Eschelon sent the following email to Matt Rossi and Judy Schultz of Qwest:

Matt and Judy,
I submitted CR PC102301-2 to CMP, via an email to you, Matt, on 10-23-01. Although it has been over a month since then, Qwest has not posted this CR to the web or listed it for presentation at a CMP meeting. Peter Wirth of Qwest sent me an email on 10/29/01 stating that Judy or her designee would contact us "in the near future" to discuss this issue. Qwest has not

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done

so. If Qwest is not planning on posting this CR on the web this week and discussing this CR at the next CMP meeting, please escalate this issue so

that we can get this CR moving. Also, please clarify that the process of accepting a CR to indicate that it is complete includes not only assigning

a CR number but also posting the CR to the web. Eschelon previously asked

that an item be added to the redesign team's agenda to address the activities between submission and acceptance of a CR or after acceptance,

if posting is not part of acceptance. This issue still needs to be addressed. If Qwest has a response to CR!

PC102301-2 please provide it to me in writing.

Thanks.

Qwest did not provide a written response. Eschelon asked Qwest about this

CR at a Change Management Process ("CMP") Re-Design meeting. Judy Schultz

of Qwest said that Qwest had determined that CR # PC102301-2 was outside the scope of CMP and would not be accepted. This decision was not communicated to Eschelon in writing.

Eschelon again asked about this issue at the monthly CMP meeting in December. Judy Schultz of Qwest said that Qwest considered the CR outside

the scope of CMP because the CR discusses a Performance Indicator Definition ("PID"). Earlier, in Re-Design sessions, Qwest had suggested language for the Master Red-lined document that would have given special status to CRs that improved performance with respect to a PID. Also, in some of Qwest's Responses to CRs in CMP, Qwest has cited to and discussed

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PIDs. Therefore, at a minimum, it is unclear when Qwest will allow discussion about PIDs and when it will not. At the December monthly CMP meeting, Judy Schultz of Qwest said that Qwest believed changes to PIDs were outside the scope of CMP. As Eschelon pointed out at the meeting, CR

PC102301-2 does not request a change to a PID. The CR simply asks Qwest to more accurately apply the existing PID language. Eschelon believes that this is the proper subject matter for a CR.

Even if Qwest disagrees about whether a CR is within the scope of CMP, Qwest should follow proper procedures with respect to the CR. Eschelon is unaware of any procedure that allows Qwest to refuse to accept a CR without posting the CR on the web and providing a response to the CR. Qwest should follow the CR process and provide a response that states its reasons for denying the CR. Without doing so, a CLEC has no opportunity to respond and, if desired, to escalate the decision.

Reason for Escalation / Dispute:
See History of Item.

Business Need and Impact:
The failure to accurately include the successful porting of number(s) from Qwest to the CLEC through NPAC when reporting on the OP13 PID measurement affects the quality of service provided to Eschelon and the remedies available for unsatisfactory quality of service. If the results are erroneous and show that Qwest is meeting the performance standard when in

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fact Qwest is not (due to inaccurate capturing of actual experience),
Qwest
does not have the incentive to correct a problem and improve
performance.

Desired CLEC Resolution:

Accept the CR and provide a written response.

Consider the CR as within the scope of CMP.

Make the change requested in the CR.

Review the process for CR initiation and processing of CRs to ensure
that

the decision as to whether to accept a CR is reviewable and subject to
escalation and dispute resolution, if there is a disagreement.

(Note that the "Immediate Qwest Action" Field above does not contain
choices suitable for Eschelon's desired resolution. The options in the
pull down menu need to be revised if that field is retained.)

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Date/Time Submitted: Wed Jan 2 17:09:08 CST 2002